

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Heather R. Wlodek

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**Presentment Date: May 10, 2022**  
**Time: 12:00 p.m.**

**Objections Due: May 10, 2022**  
**Time: 11:00 a.m.**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF TRUSTEE'S APPLICATION FOR AN ORDER  
APPROVING THE RETENTION OF ALPEGGIANI STUDIO LEGALE ASSOCIATO  
AS SPECIAL COUNSEL, RETROACTIVE TO APRIL 26, 2022**

**PLEASE TAKE NOTICE** that Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee's undersigned counsel, will present an order approving the retention of Alpeggiani Studio Legale Associato as special counsel to the Trustee, retroactive to April 26, 2022, a copy of which is annexed hereto as Exhibit A (the

“Order”), to the Honorable Cecelia G. Morris, United States Bankruptcy Judge, for signature on **May 10, 2022 at 12:00 p.m.**

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the Order (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **May 10, 2022 at 11:00 a.m.**

**PLEASE TAKE FURTHER NOTICE**, that in the event any Objections are timely served and filed, the parties will contact the Courtroom Deputy for a hearing date and the moving party will notify other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in the relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE**, that the ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all Objections.

**PLEASE TAKE FURTHER NOTICE**, that if no timely Objections are served or filed the proposed Order may be signed without a hearing.

Dated: May 4, 2022  
New York, New York

By: /s/ David J. Sheehan  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Heather R. Wlodek  
Email: hwlodek@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff*

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**[PROPOSED] ORDER GRANTING THE TRUSTEE'S APPLICATION TO RETAIN  
ALPEGGIANI STUDIO LEGALE ASSOCIATO AS SPECIAL COUNSEL  
RETROACTIVE TO APRIL 26, 2022**

Upon the Application of Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the Chapter 7 estate of Bernard L. Madoff, for authority to retain Alpeggiani Studio Legale Associato ("Alpeggiani") as special counsel, retroactive to April 26, 2022, and upon the declaration of Ms. Annunziata Melaccio submitted in connection therewith, and due and proper notice having been given under the circumstances of this case, and after due deliberation,

**IT IS HEREBY ORDERED THAT:**

1. The Application is **GRANTED**.
2. The Court finds that Alpeggiani is deemed disinterested under 15 U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain Alpeggiani as special counsel to the Trustee as provided in the Application, retroactive to April 26, 2022.